

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

In re:	:	
FIRST GUARANTY MORTGAGE CORPORATION, <i>et al.</i> ,	:	Chapter 11
Debtors. <sup>1</sup>	:	Case No. 22-10584 (CTG)
	:	Jointly Administered
	:	

**NOTICE OF (I) CONFIRMATION AND EFFECTIVE DATE OF  
THE AMENDED COMBINED DISCLOSURE STATEMENT AND CHAPTER 11 PLAN OF  
FIRST GUARANTY MORTGAGE CORPORATION AND DEBTOR AFFILIATE AND (II)  
DEADLINE UNDER THE PLAN AND CONFIRMATION ORDER TO FILE  
ADMINISTRATIVE CLAIMS, PROFESSIONAL FEE CLAIMS, AND REJECTION CLAIMS**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. **Entry of Confirmation Order.** On November 2, 2022, the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”) entered an order [Docket No. 671] (the “Confirmation Order”) confirming the *Amended Combined Disclosure Statement and Chapter 11 Plan of First Guaranty Mortgage Corporation and Debtor Affiliate* [Docket No. 652], which has been updated, modified and restated and attached as Exhibit A to the Confirmation Order and filed at Docket No. 671-1 (together with all exhibits thereto, and as may be amended, modified or supplemented, the “Plan”)<sup>2</sup> in the chapter 11 cases of the above-captioned debtors and debtors in possession (collectively, the “Debtors”).

2. **Effective Date of the Plan.** The Effective Date of the Plan occurred on November 6, 2022 at 8:00 p.m. (prevailing Eastern Time).

3. **Administrative Claim Bar Date.** As provided for in Section 3 of the Plan (defined term Administrative Expense Bar Date) and in the Confirmation Order, all requests for payment of an Administrative Claim incurred after September 30, 2022 must be filed with the Bankruptcy Court and served on counsel to the Liquidating Trustee, counsel to the Debtors, and counsel to the U.S. Trustee **no later than January 5, 2023 (the date that is 60 days after the Effective Date)**. Nothing herein shall be deemed to extend existing deadlines established for filing certain Administrative Claims accrued as of September 30, 2022 pursuant to the previous Administrative Claims bar date established as to such Administrative Claims. [Docket No. 382].

4. **Deadline to File Professional Fee Claims.** As provided for in Section 8.3 of the Plan and in the Confirmation Order, all final applications for payment of Professional Fee Claims must be

<sup>1</sup> The Debtors, along with the last four digits of each Debtor’s tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors’ mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

<sup>2</sup> Unless otherwise defined in this notice, capitalized terms used in this notice shall have the meanings ascribed to them in the Plan.

filed with the Bankruptcy Court and served on counsel to the Debtors, counsel to the Cash Flow DIP Lender, and counsel to the Liquidating Trustee **no later than 4:00 p.m. prevailing Eastern Time on December 21, 2022 (the date that is 45 days after the Effective Date)**, unless otherwise ordered by the Bankruptcy Court or such later date is agreed to by the Liquidating Trustee.

5. **Deadline to File Rejection Claims.** As provided for in Section 13.2 of the Plan and in the Confirmation Order, unless otherwise provided by a Bankruptcy Court Order, any Proofs of Claim asserting Rejection Claims pursuant to the Plan or otherwise must be filed with the Claims and Balloting Agent **no later than the later of December 6, 2022 (the date that is 30 days after the Effective Date) or 30 days after the effective date of rejection. Rejection Claims shall be classified as General Unsecured Claims and shall be treated in accordance with Section 10 of the Plan, as applicable. Any Rejection Claims that are not timely filed pursuant to Section 13.2 of the Plan shall be forever disallowed and barred.**

6. **Inquiries by Interested Parties.** Copies of the Confirmation Order (to which the Plan is attached as Exhibit A) may be examined free of charge at <http://www.kccllc.net/fgmc>. The Confirmation Order is also on file with the Bankruptcy Court and may be viewed by accessing the Bankruptcy Court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov). To access documents on the Bankruptcy Court's website, you will need a PACER password and login, which can be obtained at [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov).

Dated: November 6, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

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